

## UNITED STATES DISTRICT COURT

for the

Southern District of West Virginia

United States of America  
v.

Alan J. Disomma, Jr.

Case No.

5:22-mj-00064

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Dec. 10, 2021 - Dec. 15, 2022 in the county of Raleigh in the  
Southern District of West Virginia, the defendant(s) violated:

Code Section

Offense Description

18 USC 2422(b)

Attempted Enticement of a Minor

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.  
Complainant's signature

FBI SA Jared Jankowski

Printed name and title

Signed and sworn to by telephonic means.

~~Sworn to before me and signed in my presence.~~Date: 12/16/2022City and state: Bluefield, West VirginiaOmar J. Aboulhosn  
United States Magistrate Judge

**AFFIDAVIT**

I, Special Agent Jared Jankowski, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I have been employed as a Special Agent of the Federal Bureau of Investigation ("FBI") since September 2017, and I am currently assigned to the Charleston, West Virginia Resident Agency of the Pittsburgh Division. I completed Special Agent training at the FBI training center in Quantico, Virginia, in May 2018, which includes curriculum on conducting federal investigations. Upon graduation from the FBI academy, I was first assigned to Counterintelligence where I worked multiple cases involving economic espionage. Following Counterintelligence work I was assigned to be the task force coordinator for the West Virginia Human Trafficking and Child Exploitation Task Force where I specialize in violent crimes against children. Prior to joining the FBI, I was employed with the Defense Intelligence Agency ("DIA") as a Sergeant with the Police Department for three years. With the DIA I worked federal criminal investigations and was an operator on the Special Response Team where I assisted in protection details for government officials.

2. I make this affidavit in support of an application for a criminal complaint against ALAN J. DISOMMA, JR., age 59, charging

him with a violation of 18 U.S.C. § 2422(b). That statute makes it illegal for any person, through use of a means or facility of interstate commerce, to attempt to persuade, induce, entice, or coerce a minor to engage in sexual activity for which any person can be charged with a criminal offense.

3. The information contained in this affidavit is based on an investigation conducted by a law enforcement employee acting in an undercover capacity and information I obtained from other law enforcement officers involved in this investigation.

4. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have attempted to summarize the most relevant facts that establish the requisite probable cause. Therefore, I have not included each and every fact of this investigation. Additionally, where conversations or statements are related herein, they are set forth in substance and in pertinent part.

**PROBABLE CAUSE**

5. On or about December 10, 2021, a law enforcement officer was acting in an undercover capacity ("UCO"). In that role, the UCO had created a profile on a fetish website. The UCO was portraying a mother of two girls, ages 11 and 13, living in the Beckley, Raleigh County, West Virginia area. The UCO was contacted

by a user on the fetish website who was later identified as ALAN J. DISOMMA, JR., age 59, of Payson, Arizona.

6. In his initial messages to the UCO, DISOMMA stated that he wanted the UCO and her "cubs" to travel to Arizona so he could host them. During the conversation, the UCO advised DISOMMA she had two daughters, ages 11 and 13, and that she enjoys watching them "play." In response, DISOMMA advised the UCO that he was into "young, incest and k9." He also asked about the girls' experience levels and was told that the 11-year-old girl was a virgin but that the 13-year-old was more experienced. Further into the conversation, DISOMMA stated he would love to teach the children to be "horny sluts" and asked if the UCO believed the youngest one was "ready to take cock?" DISOMMA advised he would like to introduce the oldest child to anal sex and have them both perform oral sex on him. He also brought up possibly traveling to meet them in West Virginia.

7. On December 21, 2021, the conversation moved from the fetish website to text message. The conversation remained sexually in nature — DISOMMA consistently brought up engaging in sexual relations with both minor children. On December 25, 2021, he discussed his interest in performing oral sex on both girls and further stated, "I know the 11 yr old is ready to feel a cock in her pussy."

8. A few days later, DISOMMA asked the UCO what airport was closest to them and stated he wanted to visit them. When the UCO asked if he thought the 11-year-old was too young to have sexual intercourse, he responded, "I think she will be fine" and "I have done younger. You just have to go slow." DISOMMA advised he had sex with a 9-year-old niece previously. He stated that he introduced his niece to bestiality when she was 13 years old.

9. After mid-January 2022 DISOMMA did not respond to a message from the UCO and she did not engage in further messaging. However, in March 2022 DISOMMA reached out to the UCO again and resumed conversation about him having sex with the two girls. During this conversation, DISOMMA assured the UCO that he was interested in a real relationship and not just role play.

10. The text conversation continued sporadically from March 2022 through September 2022. During this time frame, the conversation remained focused on DISOMMA's interest in traveling to West Virginia to meet the girls and engage in oral sex and sexual intercourse with them. He also discussed having the UCO and her daughters move to Arizona to live with him.

11. In September 2022, DISOMMA reinitiated and had relatively continuous conversations with the UCO. Throughout the conversations DISOMMA continued to discuss in detail his plans to engage in sexual activity with the girls. He also discussed how he

planned to give them various gifts, including a video game system and other "rewards" for engaging in sexual activity.

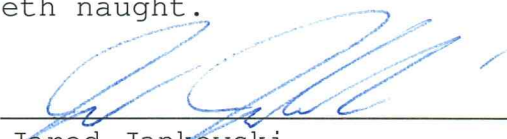
12. In early December, DISOMMA booked a flight from Arizona to Yeager Airport in Charleston, West Virginia, with a scheduled arrival of December 18, 2022. He then planned to travel with the UCO back to Beckley. During the trip, he had stated that he intended to engage in sexual activity with both girls.

### **CONCLUSION**


13. Based upon the information provided above, your affiant alleges that there exists probable cause to believe that ALAN J. DISOMMA, JR., knowingly violated 18 U.S.C. § 2422(b), in that between on or about December 10, 2021 and December 15, 2022, he knowingly attempted to persuade, induce, and entice a person he believed to be a 13-year-old minor to engage in sexual activity for which any person can be charged with a criminal offense. Such criminal offenses include, but are not limited to, Third Degree Sexual Assault under West Virginia Code §61-8B-5 and a violation of 18 U.S.C. § 2423(b), which would be committed if DISOMMA traveled from Arizona to West Virginia for the purpose of engaging in sexual activity with the minor. DISOMMA used a means and facility of interstate commerce to engage in this attempt to persuade, induce, and entice the minor in that he used the Internet and cellular networks. DISOMMA engaged in numerous substantial

steps to corroborate his intent to persuade the minor to engage in sexual activity, including purchasing a plane ticket to travel to West Virginia.

Further your Affiant sayeth naught.

  
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Jared Jankowski  
Special Agent  
Federal Bureau of Investigation

Signed and sworn to by telephonic means this 16th day of December, 2022.

  
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Omar J. Aboulhosen  
United States Magistrate Judge